

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

STEPHEN WAYNE CORMACK,

Defendant.

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CRIM. NO. ELH-19-0450

CONSENT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, United States hereby moves for entry by this Court of a protective order that will ensure the confidentiality of internal affairs records disclosed to the Office of the United States Attorney by law enforcement agencies and information contained within those records (“Protected Information”), which the government intends to disclose to counsel for defendant Stephen Wayne Cormack (the “Defendant”).

Entry of a protective order restricting the use, dissemination and disposition of Protected Information is essential to permit this disclosure and for the parties to confer regarding—and, if necessary, for the Court to decide—whether any of the Protected Information is appropriate subject matter for impeachment of law enforcement witnesses at the pretrial motions hearing or trial in this matter.

The United States has conferred with counsel for the Defendant regarding the protective order proposed by the United States (the “Proposed Protective Order”) and have reached an agreement with respect to the provisions contained therein.

A copy of the Proposed Protective Order is submitted herewith.

Respectfully submitted,

Jonathan F. Lenzner
Acting United States Attorney

/s/
Matthew J. Maddox
Adam K. Ake
Assistant United States Attorneys
36 South Charles Street, Fourth Floor
Baltimore, Maryland 21201

CERTIFICATE OF SERVICE

This is to certify on this 26th day of May, 2021, that a copy of the foregoing Consent Motion for Entry of Protective Order and the Proposed Protective Order was served on counsel for all parties via the electronic court filing system.

_____/s/_____
Matthew J. Maddox
Assistant United States Attorney